

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

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**IN RE:**

**CUMMINGS MANOOKIAN, PLLC**

**Debtor.**

**JEANNE ANN BURTON, TRUSTEE**

**Plaintiff,**

**v.**

**HAGH LAW, PLLC; AFsoon  
HAGH; and MANOOKIAN PLLC,**

**Defendants.**

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**Case No, 3:19-bk-07235  
Chapter 7  
Judge Walker**

**Adv. Proc. No. 3:20-ap-90002**

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**BRIAN MANOOKIAN AND MANOOKIAN PLLC'S  
NOTICE OF APPEAL AND STATEMENT OF ELECTION**

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Manookian PLLC and Brian Manookian, through counsel, gives notice of his appeal from the Bankruptcy Court's June 1, 2022 Order (Doc 178). In furtherance of the same, Mr. Manookian states as follows.

**Part 1: Identity of Appellant**

1. The names of the appellants are Brian Manookian and Manookian, PLLC. Mr. Manookian is the sole owner and member of the Debtor, Cummings Manookian, PLLC as well as the sole owner and member of Adversary Proceeding Defendant, Manookian, PLLC.

## **Part 2: Subject of the Appeal**

2. Mr. Manookian appeals from the Court's Order Quashing Notice of Deposition (**Doc. 178**). The Order was entered on June 1, 2021.

## **Part 3: Parties to the Appeal**

3. The names of the Parties to the Order appealed from as well as the contact information for their attorneys are:

- a. Debtor Cummings Manookian,  
Jay R. Lefkovitz  
Lefkovitz & Lefkovitz, PLLC  
312 East Broad Street, Suite A  
Cookeville, TN 38501  
(931) 528-5297 (T)  
931-526-6244 (F)  
JLefkovitz@lefkovitz.com
- b. Trustee Jeanne Anne Burton  
Phillip Young  
One Franklin Park  
6100 Tower Circle, Suite 200  
Franklin, TN 37067  
(615) 465-6008 (T)  
phillip@thompsonburton.com
- c. Creditor Grant, Konvalinka & Harrison, P.C.,  
John P. Konvalinka  
Grant, Konvalinka & Harrison, P.C.  
633 Chestnut Street Suite 900 Republic Centre  
Chattanooga, TN 37450-0900  
(423) 756-8400 (T)  
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- d. Creditor D.F. Chase, Inc.  
Daniel Puryear  
Puryear Law Group  
104 Woodmont Boulevard, Suite 201  
Nashville, TN 37205  
(615) 255-4859 (T)  
(615) 630-6602 (F)  
dpuryear@puryearlawgroup.com

**Part 4: Election to have appeal heard by District Court**

4. Mr. Manookian elects to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

Date: June 14, 2022

Respectfully submitted,

/s/ John Spragens  
John Spragens (TN Bar No. 31445)  
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*Attorney for Manookian PLLC and  
Brian Manookian*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed June 14, 2022 and served electronically upon all parties in interest or their counsel as indicated on the receipt issued by the Court's electronic filing system.

/s/ John Spragens